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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 23-00130 JD
)	
Plaintiff,)	STIPULATION TO CONTINUE CHANGES OF
)	PLEA AND EXCLUDE TIME FROM SEPTEMBER
v.)	30, 2024, TO OCTOBER 21, 2024, AND
)	[PROPOSED] ORDER
SEVERO PINEDA and FRANCISCO JAVIER)	
SOLORIODUARTE,)	
)	
Defendants.)	

Counsel for defendants Severo Pineda and Francisco Javier Solorioduarte and the United States jointly request that the defendants' changes of plea currently scheduled for September 30, 2024, be continued until October 21, 2024. The reason for the request is that defense counsel require additional time to review discovery and the government's plea offers with their clients with the assistance of Spanish language interpreters.

It is therefore stipulated by and between counsel for the United States and counsel for defendants Severo Pineda and Francisco Javier Solorioduarte that time be excluded under the Speedy Trial Act from September 30, 2024, through October 21, 2024. The government and counsel for the defendants agree that time be excluded under the Speedy Trial Act so that defense counsel can continue to prepare,

STIPULATION AND ~~[PROPOSED]~~ ORDER
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including by reviewing discovery produced by the government. The parties therefore stipulate and agree that excluding time until October 21, 2024, will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding the time from September 30, 2024, through October 21, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that he has obtained approval from counsel for the defendants to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: September 20, 2024

/s/
DAN M. KARMEL
Assistant United States Attorney

DATED: September 20, 2024

/s/
K. ALEXANDRA MCCLURE
Counsel for Defendant PINEDA

DATED: September 20, 2024

/s/
RICHARD TAMOR
Counsel for Defendant SOLORIODUARTE

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court hereby continues the changes of plea in the above-captioned matter from September 30, 2024, to November 4, 2024, and finds that failing to exclude the time from September 30, 2024, through November 4, 2024, would unreasonably deny defense counsel and the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from September 30, 2024, to November 4, 2024, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time from September 30, 2024, through November 4, 2024, shall be excluded from computation

1 under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

2 IT IS SO ORDERED.

3
4 DATED: September 27, 2024


HON. JAMES DONATO
United States District Judge